

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

AMAZON.COM SERVICES, LLC,

Petitioner,

v.

UNITED STATES DEPARTMENT OF JUSTICE,

Respondent,

and

MARTIN J. WALSH, SECRETARY OF THE
UNITED STATES DEPARTMENT OF LABOR,

Intervenor-Cross Petitioner.

No. C22-1815-JCC

**JOINT STIPULATION AND ORDER
GRANTING EXTENSION OF
DEPOSITION DEADLINE**

IT IS HEREBY STIPULATED, AGREED, AND RESPECTFULLY REQUESTED

by and between Petitioner Amazon.com Services LLC (“Amazon”), Respondent the United States Department of Justice (“DOJ”), and Intervenor Julie A. Su, Acting Secretary, United States Department of Labor (the “Secretary”)¹ (hereinafter, collectively “the Parties”), through their counsel of record, as follows:

WHEREAS the Court’s January 30, 2023 Order (Dkt. 37) ordered that Amazon complete

¹ Pursuant to Rule 25(d) of the Federal Rules of Civil Procedure, Acting Secretary of Labor Julie A. Su is automatically substituted for Martin J. Walsh as Intervenor-Cross Petitioner.

1 its review and production of all responsive ESI and complete privilege logs for any withheld
2 responsive documents on the OSHA subpoena requests by June 30, 2023, and provide its
3 responses to the FIRREA-specific subpoena requests served by SDNY by July 31, 2023.

4 WHEREAS Amazon completed its production of non-privileged ESI and a privilege log
5 by June 30, 2023.

6 WHEREAS, as noted in the Parties' most recent status reports (Dkt. Nos. 48, 49),
7 Amazon agreed to conduct an additional review of certain entries on its privilege log by July 14,
8 2023.

9 WHEREAS Amazon completed that re-review and supplemental production on July 14,
10 2023.

11 WHEREAS, based on the Parties' representations in their prior status reports (Dkt. Nos.
12 48, 49), the Court extended Amazon's time to "make any relevant witnesses available to SDNY
13 for deposition" to August 31, 2023 to permit the Parties to schedule the depositions in light of
14 witness and counsel availability (Dkt. No. 49).

15 WHEREAS the Parties have been working collaboratively to schedule the depositions for
16 these five witnesses;

17 WHEREAS availability of witnesses and counsel made holding the depositions for these
18 five witnesses by August 31 infeasible; and

19 WHEREAS the Parties agree these depositions should be taken on mutually agreed upon
20 dates after the August 31 deadline.

**NOW, THEREFORE, IT IS HEREBY STIPULATED, AGREED, AND
RESPECTFULLY REQUESTED BY THE PARTIES THAT:**

1. The depositions of the five remaining witnesses subpoenaed by DOJ shall be held on mutually agreed upon dates on or before October 20, 2023; and
2. The Parties shall provide an update regarding the status of these depositions on or before October 20, 2023.

IT IS SO STIPULATED.

DATED: August 29, 2023

/s/ James E. Howard

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JOINT STIPULATION AND ORDER
REGARDING DEADLINE FOR DEPOSITIONS -3
Case No. C22-1815-JCC

/s/ Jacob Lillywhite (with permission)

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Petitioner Julie A. Su, Acting Secretary of the
United States Department of Labor*

IT IS SO ORDERED.



MICHELLE L. PETERSON
United States Magistrate Judge

DATED: August 30, 2023